

PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	04/26/2025		
2. Rule 26(a)(1) disclosures exchanged	04/26/2025		
3. Requested:			
a. Medical records authorization	04/28/2025		
b. Identification of John Doe/Jane Doe defendants	04/28/2025		
4. Procedures for producing Electronically Stored Information (ESI) discussed	04/28/ 2025		
5. Protective Order to be submitted for court approval (see Standing Protective Order on the Chambers website)	04/28/ 2025		
B. SETTLEMENT PLAN			
1. Plaintiff to make settlement demand	06/26/2025		
2. Defendant to make settlement offer	07/10/2025		
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)	09/26/ 2025		
4. Settlement Conference (proposed date)	09/26/2025		
C. PROPOSED DEADLINES			
1. Motion to join new parties	07/28/2025		
2. Motion to amend pleadings	07/28/2025		
3. Initial documents requests and interrogatories	05/26/2025		
4. All fact discovery to be completed	10/27/ 2025		
5. Joint status report certifying the close of fact discovery (one week later)	11/03/ 2025		

6. Expert discovery (only if needed)		<i>Check here if not applicable</i> <input type="checkbox"/>	
	DONE	NOT APPLICABLE	DATE
a. Affirmative expert reports due	12/15/2025		
b. Rebuttal expert reports due	01/30/2026		
c. Depositions of experts to be completed	03/31/2026		
7. Completion of all discovery (if different from C.4)	03/31/2026		
8. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated (one week later)	04/07/2026		
9. If any party seeks a dispositive motion, date to a. file request for pre-motion conference (if required), or b. file briefing schedule for the motion	12/15/2025		
10. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)	05/29/2026		
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motions?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
2. All parties consent to Magistrate Judge jurisdiction for trial?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases			
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification			
a. Response due			
b. Reply due			

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

LARA K. ESHKENAZI
 United States Magistrate Judge

Date